

June 27, 2025

VIA ECF

The Honorable Paul G. Gardephe
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: American Civil Liberties Union v. U.S. Department of Homeland Security, et al., No. 1:20-cv-10083-PGG

Dear Judge Gardephe,

Pursuant to this Court's Order of May 16, 2025, ECF No. 59, in the above-referenced Freedom of Information Act ("FOIA") case seeking records related to the defendant agencies' purchase of cell-phone location data for immigration enforcement and other purposes, we write, jointly with counsel for Defendants, to provide this Court an update on the progress of this case.

As the parties noted in the last joint status update letter filed on May 16, 2025, ECF No. 58, the only remaining issue in this case is Plaintiff's claim for attorneys' fees and costs. Plaintiff sent Defendants a settlement proposal regarding attorneys' fees and costs on June 26, 2025.

The parties will continue to work diligently to attempt to reach an agreement on attorneys' fees and costs. To allow Defendants sufficient time to consider Plaintiff's proposal and the parties time to meet and confer to determine if they can resolve Plaintiff's claim for fees and costs consensually, we request leave from the Court to file a further status update letter on August 11, 2025.

Respectfully submitted,

/s/ Lauren Yu

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